

**Mark A. Crabtree, OSB #015070**

[CrabtreeM@JacksonLewis.com](mailto:CrabtreeM@JacksonLewis.com)

**April Upchurch Fredrickson, OSB #132027**

[April.fredrickson@JacksonLewis.com](mailto:April.fredrickson@JacksonLewis.com)

Jackson Lewis P.C.

1001 SW 5<sup>th</sup> Avenue, Ste. 1205

Portland, OR 97204

(503) 229-0404

(503) 229-0405 (facsimile)

**ATTORNEYS FOR DEFENDANT**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

PORTLAND DIVISION

SUSAN DENISE MCPHEE,

Plaintiff

v.

TÜV SÜD AMERICA, INC., a foreign  
business corporation,

Defendant.

) **Case No.**  
)  
) **DECLARATION OF MARK CRABTREE**  
) **IN SUPPORT OF DEFENDANT'S**  
) **NOTICE OF REMOVAL**  
)  
) **[Removal of Multnomah County**  
) **Case No. 15CV02114]**  
)  
)

I, Mark Crabtree, hereby declare:

1. I am an attorney employed by the law firm Jackson Lewis P.C., attorneys of record for Defendant TÜV SÜD America, Inc. I have personal knowledge of the matters set forth below and if called to testify I would testify as follows:

2. On February 25, 2015, I accepted service of the Summons and Complaint on behalf of Defendant TÜV SÜD America, Inc. Attached as Exhibit 1 hereto, is a true and correct of the Acceptance of Service which I signed on behalf of Defendant.

3. Aside from the Summons and Complaint, no additional documents have been filed or served in this matter by either party.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: March 13, 2015

By: /s/ Mark A. Crabtree

Mark A. Crabtree, OSB #015070  
Attorney for Defendant

**DECLARATION OF SERVICE**

I hereby certify that I served the foregoing **DECLARATION OF MARK CRABTREE**  
**IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL** by:

■ CM/ECF

- ☐ Electronic Mail
- ☐ US Postal Service
- ☐ Facsimile Service
- ☐ Arranging for Hand Delivery
- ☐ Federal Express

as follows on the date stated below:

Craig A. Crispin  
Crispin Employment Lawyers  
1834 SW 58<sup>th</sup> Ave., Suite 200  
Portland, OR 97221  
Phone: 503-293-5770  
Email [crispin@employmentlaw-nw.com](mailto:crispin@employmentlaw-nw.com)

Attorney for Plaintiff

DATED this 13th day of March, 2015.

By: /s/ Lori Dayton  
Lori Dayton

4813-5536-9250, v. 1